

G O D D A R D L A W P L L C

39 Broadway, Suite 1540 | New York, NY 10006

Office. 646.504.8363

Fax. 212.473.8705

Megan@goddardlawnyc.com

WWW.GODDARDLAWNYC.COM

April 13, 2022

VIA ECF and EMAIL

Honorable Judge John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 12D
New York, New York 10007
CronanNYSDChambers@nysd.uscourts.gov

Re: Shamciyan v. Acacia Network, Inc., et al.
Case No.: 22-cv-02122-JPC

Dear Your Honor:

The undersigned represents Plaintiff Michael Shamciyan ("Plaintiff") in the above-referenced matter. We write with the consent of the Defendants to respectfully request a two-week extension of Plaintiff's deadline to respond to Defendants' Pre-Motion Letter [ECF No.8] from May 2, 2022, to and including May 16, 2022. This is the first request for such an extension of time.

The extension is sought due to the main attorney assigned to this matter leaving the firm less than a week ago and the attorney now handling the matter dealing with childcare issues due to Covid-19. This additional time will allow the attorney now handling this matter adequate time to review the matter and Defendants' Pre-Motion Letter in order to respond. Plaintiff's counsel intends to meet and confer with counsel for Defendants to limit and/or avoid the issues presented to this Court.

We thank the Court for its time and attention to this matter, its consideration of this request, and apologize for filing this request on such short notice.

Respectfully submitted,
GODDARD LAW PLLC

/s/ Megan S. Goddard

By: Megan S. Goddard, Esq.

cc: All counsel [*Via ECF*]

This request is granted. Plaintiff shall file a response to Defendants' pre-motion letter, *see* Dkt. 8, by May 16, 2022. The Clerk of the Court is respectfully directed to close the motion pending at Docket Number 11.

SO ORDERED.

Date: May 3, 2022

New York, New York



JOHN P. CRONAN

United States District Judge